

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
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CHAMBERS OF
ALVIN K. HELLERSTEIN
U.S.D.J.

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| IN RE WORLD TRADE CENTER DISASTER SITE LITIGATION | : | 21 MC 100 (AKH) (All Cases on Exhibit A) |
| IN RE COMBINED WORLD TRADE CENTER AND LOWER MANHATTAN DISASTER SITE LITIGATION (straddler plaintiffs) | : | 21 MC 103 (AKH) (All Cases on Exhibit A) |

IT IS HEREBY STIPULATED AND AGREED by and between the Plaintiffs and The
Port Authority of New York and New Jersey ("Port Authority") that:

1. Plaintiffs and the Port Authority have entered into a Settlement Agreement
resolving claims by Plaintiffs against the Port Authority in the above-captioned action;
2. The Settling Plaintiffs, identified in Exhibit A attached hereto, have executed
releases and covenants not to sue in which such Plaintiffs have released the Port Authority from
any and all obligations and liability for past, present, and future injuries arising out of or relating
in any way to World Trade Center-related rescue, recovery, and/or debris-removal operations
and/or clean-up at any location on and/or after September 11, 2001. Accordingly, the Settling
Plaintiffs' claims against the Port Authority shall be dismissed, and hereby are dismissed, with
prejudice, and all cross-claims against the Port Authority shall be dismissed, with prejudice.

Dated: 5/12/11

Paul Napoli
Paul J. Napoli
Worby Groner Edelman & Napoli Bern LLP
Plaintiffs' Counsel

Dated: 5/12/11

Paul A. Scrudato
Paul A. Scrudato
Schiff Hardin LLP
Counsel to The Port Authority of New York
and New Jersey

Dated: 5/12/11



William H. Groner
Worby Groner Edelman & Napoli Bern LLP
Plaintiffs' Counsel

SO ORDERED, this 13 day of May, 2011,



ALVIN K. HELLERSTEIN
United States District Judge

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